

**IN THE UNITED STATES BANKRUPTCY COURT**  
**FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

---

IN RE: Daniel Ross Boyer Sr. aka Daniel R. Boyer aka  
Daniel R. Boyer, Sr. aka Daniel Ross Boyer  
Kathleen Teresa Boyer aka Kathleen T. Boyer  
Debtor(s)

CHAPTER 13

FREEDOM MORTGAGE CORPORATION, its  
successors and/or assigns

Movant

NO. 18-04751 HWV

vs.

Daniel Ross Boyer Sr. aka Daniel R. Boyer aka Daniel  
R. Boyer, Sr. aka Daniel Ross Boyer  
Kathleen Teresa Boyer aka Kathleen T. Boyer  
Debtor(s)

Jack N. Zaharopoulos

Trustee

**PRAECIPE TO WITHDRAW**

**TO THE CLERK OF THE BANKRUPTCY COURT:**

Kindly withdraw the Notice of Mortgage Payment Change beginning 6/1/2023 for FREEDOM MORTGAGE CORPORATION, which was filed with the Court on or about **May 3, 2023 under Claim No. 5.**

Dated: July 18, 2023

Respectfully submitted,

/s/ Denise Carlon,  
Denise Carlon, Esq.  
KML Law Group, P.C.  
BNY Mellon Independence Center  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
Phone: (215)-627-1322  
dcarlon@kmlawgroup.com